

# **EXHIBIT 4**

**For Federal civil complaint  
-- MOTION UNDER RULE 45 ASKING THE  
CLERK TO SUBPOENA ATTORNEY JOHN  
SCOTT COALTER FOR DISCOVERY AND TO  
PROVE THE FACTUAL MATTER UNDER  
COMPLAINT --**

**Brian David Hill v. Executive Office  
for United States Attorneys (EOUSA),  
United States Department of Justice  
(U.S. DOJ)**


**Civil Case Number 4:17-cv-00027**

with a prepubescent female. Later in the video, the prepubescent female is show masturbating and using a vibrator. The adult female and prepubescent female engage in oral sex, along with other sex acts.

67. The partial downloaded version I obtained directly from IP address 24.148.156.211 matches portions of what was described above and is playable and viewable and the viewable portion contains child pornography even though it is a portion of the entire file.
68. The second file name is (Pthc) Russia 10Yo-11Yo Little Brother And Sister-2 - Boy&Girls Fucking Just Posing Or Naked 1.avi this video shows two preteen boys on a bed who get nude and have sex in various positions with a young teen girl. Other clips show nude children playing in the sand and in various sexual positions on a bed. The partial downloaded version I obtained directly from IP address 24.148.156.211 matches portions of what was described above and is playable and viewable.
69. The UIS was also able to identify the software in use by that IP address as eMule v0.5 and also a Globally Unique Identification number associated with the computer using his IP address. The GUID associated with this address at the time of the download was 8348EFA7A30EF645C3D806F648766F26. A GUID is assigned to the computer when a file sharing program (such as E-Mule or any other peer-to-peer file sharing platform) is placed onto the computer. This series of numbers and letters is a unique serial number generated for each computer running P2P software around the world. Should the computer be used to access the Internet from a different IP address the GUID will remain the same as it is intrinsic to the computer system in almost all software programs. Further, should the user of the computer update the file sharing program with a newer version, a new GUID will be assigned to the computer for the updated program.
70. Your affiant determined, by using Internet websites that the IP address 24.148.156.211 where child pornography was downloaded from, on the dates listed above was owned by Earth Link as the Internet Service Provider (ISP). On August 7, 2012 I contacted SBI Agent Gerald Thomas who forwarded my request for an administrative subpoena to Cheryl King of the NCSBI. Ms. King filed and administrative subpoena for the IP address 24.148.156.211 for the subscriber information on July 21, 2012 at 0400 GTC. Records below indicate 24.148.156.21 was assigned to the following Earth Link customer for the time request. The following information was returned by Earth Link on August 8, 2011:

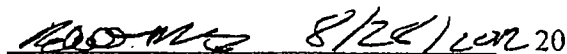
Subscriber Name: Roberta Hill  
Service Address: 413 N 2<sup>nd</sup> AVE  
Telephone #: 336-510-7972  
User Name: ms21842365@earthlink.net

71. Time Warner's information described the IP address as issued to the above subscriber from 03/13/2009 to the date of the return of service.

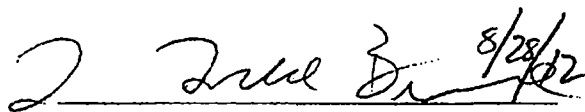
  
Signature: Judicial Official/Date

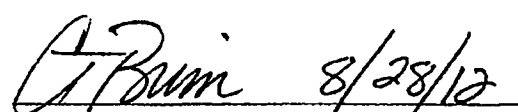
  
Signature: Law Enforcement/Date

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Additional Affiant: Signature/Date

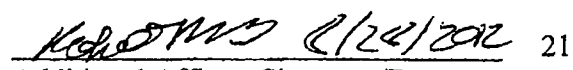
  
Additional Affiant: Signature/Date

72. In verification of the occupants of 413 N 2<sup>nd</sup> Ave. Your affiant obtained the NC Department of Motor Vehicles Driver License information for Roberta Hill NC OL# 8867196 that information listed her current address as 413 N 2<sup>nd</sup> Ave.. It listed her as having a Pontiac Sunfire registered at that address license number PWA6942. Brian David Hill is also listed with the NC Department of Motor Vehicles at this address with a NC OL# 38360908.
73. Based on the foregoing identification by IP address 24.148.156.211 a computer at the location of the IP addresses and physical address listed in this affidavit (24.148.156.211) offered for distribution files with ED2K values that are known or suspected to contain child pornography and sent to your affiant files containing child pornography. A reasonable officer with the proper training and experience could infer and conclude from the logs that the computer at the reported IP addresses recently offered for distribution files with digital signatures of known or suspected child pornography. It could also be inferred with a high degree of certainty, on your affiant's part, that the (Digital Signatures-or hash values) and IP addresses logged were sharing or offering to share those files on the eDonkey Network to other users. Therefore there is probable cause to believe that there is evidence (child pornography files and computer trace evidence listed in this warrant) of a continual pattern in July of 2012 on-going possession and distribution of child pornography through the P2P network (second degree sexual exploitation of a minor) (G.S. 14-190.17) located on the premises of 413 N 2<sup>nd</sup> Ave, Mayodan NC, the Home of Roberta Hill W/F DOB: 05/14/1967 NC OLN: 8867196 and Brian David Hill W/M DOB: 5/26/1990 NC OLN: 38360908, and/or any other person at the residence of at 413 N 2<sup>nd</sup> Ave Mayodan NC to include any vehicles located at that address: specifically registered to Roberta Hill W/F DOB: 05/14/1967 NC OLN: 8867196 that are associated with the home: a 200 Pontiac Sunfire Plate # PWA6942.
74. In your affiant's training and experience with computers your affiant has found that many individuals store their computers (laptops) inside vehicles at the residence and failure to check the vehicles may have result in not finding the computer at the residence. In your affiant's training and experience the lease of the IP address is not always the one who used the computer on the network and frequently others in homes where an IP address is assigned can just as well be the perpetrator. As a result it is imperative to search for all computers in the home and or vehicles in order to determine who actually offered child pornography and distributed child pornography to me. It is highly probable in your affiant's training and experience with this network that a household member of the account identified by Earth Link is active in possession and sharing known or suspected child pornography on the P2P network. A search of that residence where the Cable Internet subscription come back to and the computers and routers at that residence will reveal who at that residence has been involved in active participation in the distribution, possession, receipt, and sharing of child pornography files.

  
Signature: Judicial Official/Date

  
Signature: Law Enforcement/Date

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Additional Affiant: Signature/Date

  
Additional Affiant: Signature/Date 21

kelompok

Me this, the 28<sup>th</sup> day of August, 2012

Judicial Official *Superior Court*

Signature: Judicial Official/Date

Signature: Law Enforcement/Date

W. J. 8/28/2022 22  
Additional Affiant: Signature/Date

Additional Affiant: Signature/Date